

Rosemarie T. Ring  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.801.7358  
Email: rring@gibsondunn.com

*Attorney for Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Facebook Holdings, LLC;  
Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and  
Mark Elliot Zuckerberg*

*Additional counsel listed on signature pages*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT	)	
ADDICTION/PERSONAL INJURY	)	MDL No. 3047
PRODUCTS LIABILITY LITIGATION	)	
	)	Case No. 4:22-md-03047-YGR
	)	
ALL ACTIONS	)	<b>NOTICE OF SUBMISSION OF</b>
	)	<b>DOCUMENTS UNDER SEAL</b>
	)	
	)	Judge Yvonne Gonzalez Rogers
	)	
	)	
	)	

---

PLEASE TAKE NOTICE THAT, in accordance with Case Management Order #3 (ECF No. 111), Meta Platforms, Inc. (“Meta”) is submitting for the Court’s review the non-public requests for documents issued to Meta in State Attorneys General (“AGs”) investigations related to youth (among other topics).

At the December 14, 2022 Case Management Conference, the Court asked Meta whether, in making productions, it had identified for the State AGs the documents that were responsive to particular requests. Except in limited circumstances identified in Meta’s under seal submission, Meta did not produce documents to the State AGs in a manner that identified which particular documents were responsive to each specific request, although the production letters generally identified the set of requests to which the documents included in each production were responsive. Meta requested confidential treatment of materials produced to the State AGs, pursuant to confidentiality agreements with the State AGs and/or applicable state laws.

As Meta noted in the December 8, 2022 Case Management Statement (Dkt. 96), with respect to any production ordered by the Court, Meta respectfully requests that it be provided sufficient time to undertake a review of its prior productions for relevance and/or redactions, as may be necessary based on the terms of any Order by the Court. If any productions are ordered, Meta respectfully requests that the documents be accorded the highest tier of confidential treatment and that the Court allow the parties to meet and confer about a timeline and parameters for the productions, and a process for Plaintiffs to challenge the confidentiality of any documents they may wish to use in their Master Complaint (or any other public filing or proceeding).

DATED: December 19, 2022

Respectfully submitted,

By: /s/ Rosemarie T. Ring

Rosemarie T. Ring  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.801.7358  
Email: rring@gibsondunn.com

Phyllis A. Jones, *pro hac vice*  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Facebook Payments, Inc.;  
Facebook Technologies, LLC; Instagram, LLC;  
Siculus, Inc.; and Mark Elliot Zuckerberg*

\* \* \* \* \*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

Pursuant to Civil Local Rule 5-1(h)(3) of the Northern District of California, I attest that  
concurrence in the filing of the document has been obtained from each of the other signatories to this  
document.

DATED: December 19, 2022

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rosemarie T. Ring  
Rosemarie T. Ring